

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re Chapter 9  
CITY OF DETROIT, MICHIGAN, Case No. 13-53846  
Debtor. Judge Thomas J. Tucker

**CERTIFICATION OF NO RESPONSE OR OBJECTION**  
**REGARDING DEBTOR'S SIXTY-SIXTH OMNIBUS OBJECTION TO**  
**CERTAIN CLAIMS**

## **(No Valid Basis for any Liability of the City)**

On June 11, 2019, the City Of Detroit (“City”) filed its Sixty-Sixth Omnibus Objection to Certain Claims (No Valid Basis for any Liability of the City) (“66th Omnibus Objection”). [Doc. No. 13071]. The 66th Omnibus Objection was served by the City’s claims and noticing agent, Kurtzman Carson Consultants, upon the claimants identified in Exhibit 2 of the 66th Omnibus Objection at the address set forth by each of the claimants on its respective proof of claim, and all other parties who have requested notice pursuant to Bankruptcy Rule 2002. *See Certificate of Service Exhibit A.*

No responses to the 66th Omnibus Objection have been filed with the Court and the time to do so has passed. The City respectfully requests that the Court enter an order in substantially the same form as the one which was attached to the 66th Omnibus Objection. *See Proposed Order Exhibit B.*

Respectfully submitted,

By: /s/ Marc N. Swanson  
Jonathan S. Green (P33140)  
Marc N. Swanson (P71149)  
MILLER, CANFIELD, PADDOCK AND  
STONE, P.L.C.  
150 West Jefferson, Suite 2500  
Detroit, Michigan 48226  
Telephone: (313) 496-7591  
Facsimile: (313) 496-8451  
[green@millercanfield.com](mailto:green@millercanfield.com)  
[swansonm@millercanfield.com](mailto:swansonm@millercanfield.com)

and

Charles N. Raimi (P29746)  
Deputy Corporation Counsel  
City of Detroit Law Department  
2 Woodward Avenue, Suite 500  
Coleman A. Young Municipal Center  
Detroit, Michigan 48226  
Telephone: (313) 237-5037  
Facsimile: (313) 224-5505  
[raimic@detroitmi.gov](mailto:raimic@detroitmi.gov)

Attorneys for the City of Detroit

DATED: August 22, 2019

## **Exhibit A**

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re:

Chapter 9

City of Detroit, Michigan,

Case No. 13-53846

Debtor.

Hon. Thomas J. Tucker

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**CERTIFICATE OF SERVICE**

I, Lydia Do, certify and say that I am employed by Kurtzman Carson Consultants LLC (KCC), the claims and noticing agent for the Debtor in the above-captioned case.

On June 11, 2019, at my direction and under my supervision, employees of KCC caused to be served the following document via Email on the service list attached hereto as **Exhibit A**; and via First Class mail on the service lists attached hereto as **Exhibit B** and **Exhibit C**:

- **Debtor's Sixty-Sixth Omnibus Objection to Certain Claims** [Docket No. 13071]

Dated: June 17, 2019

/s/ Lydia Do \_\_\_\_\_  
Lydia Do  
KCC  
2335 Alaska Ave  
El Segundo, CA 90245

# **EXHIBIT A**

**Exhibit A**  
Served via Email

Party Description	Company	Contact	Email
Union Representative	AFSCME Council #25	Attn: Catherine Phillips	cphillips@miafscme.org
Union Representative	AFSCME Council #25	Attn: DeAngelo Malcolm	dmalcolm@miafscme.org
Union Representative	AFSCME Local # 6087	Attn: Clarence Sanders	clrnscndrs@yahoo.com
Union Representative	AFSCME Local #0062	Attn: Lacydia Moore-Reese	Reesel@detroitmi.gov
Union Representative	AFSCME Local #0207	Attn: James Williams	afscme207@sbcglobal.net
Union Representative	AFSCME Local #0214	Attn: June Nickleberry	missnick64@hotmail.com
Union Representative	AFSCME Local #0229	Attn: Zachary Carr	afscmeloalocal229@ymail.com
Union Representative	AFSCME Local #0273	Attn: Sceecilla Hunt	anurses@att.net
Union Representative	AFSCME Local #0542	Attn: Phyllis McMillon	philphil48238@yahoo.com
Union Representative	AFSCME Local #0836	Attn: Robert Donald	union836@yahoo.com
Union Representative	AFSCME Local #1023	Attn: Delia Enright	;delaenright@hotmail.com
Union Representative	AFSCME Local #1206	Attn: Arlene Kirby	arlene.kirby@yahoo.com
Union Representative	AFSCME Local #2394	Attn: Yalonda King	KingY687@detroitmi.gov
Union Representative	AFSCME Local #2799	Attn: Yvonne Ross	Yvonnners2001@yahoo.com
Union Representative	AFSCME Local #2920	Attn: Thomas Johnson II	local2920@sbcglobal.net
Counsel for Dexia Crédit Local, Dexia Holdings, Inc., Norddeutsche Landesbank Luxembourg, S.A., on behalf of Norddeutsche Landesbank Covered Finance Bank S.A. (collectively "Dexia") and Ad Hoc COPs Holders; and Panning Capital Management, LP, Monarch Alternative Capital LP, Bronze Gable, L.L.C. Aurelius Capital Management, LP, Stone Lion Capital Partners L.P.,	Allard & Fish PC	Deborah L Fish and Timothy R. Graves	dfish@allardfishpc.com; tgraves@allardfishpc.com
Union Representative	Amalgamated Transit Union, Division 26	Attn: Henry Gaffney	atulocal26pba@aol.com
Counsel for AFSCME and the Detroit, Michigan, Retiree Sub-Chapter 98 of the American Federation of State, County & Municipal Employees, AFL-CIO	American Federation of State, County & Municipal Employees, AFL-CIO	William Lurye Matthew Stark Blumin & Michael Artz	BLurye@afscme.org; martz@afscme.org; mblumin@afscme.org
Counsel for Ambac Assurance Corporation	Arent Fox LLP	David L Dubrow	David.Dubrow@arentfox.com
Counsel for Ambac Assurance Corporation	Arent Fox LLP	Emily Baver	emily.baver@arentfox.com
Counsel for Attorney General Bill Schuette	Assistant Attorney General Solicitor General and Deputy Solicitor General	Michael R Bell John J Bursch and B Eric Restuccia	BellM1@michigan.gov
Union Representative	Assistant Supervisors of Street Maintenance & Construction Association	Attn: Herbert Jenkins	JenkinsH@detroitmi.gov
Union Representative	Association of City of Detroit Supervisors	Attn: Richard King	KingR@detroitmi.gov
Union Representative	Association of Detroit Engineers	Attn: Sanjay M. Patel	patel@dwsd.org
Union Representative	Association of Municipal Engineers	Attn: Partho Ghosh	pghosh@dwsd.org
Union Representative	Association of Municipal Inspectors	Attn: Michael Neil	m.neil@sbcglobal.net
Union Representative	Association of Professional & Technical Employees	Attn: Dempsey Addison	theda3t@yahoo.com
The Office of the Attorney General of the State of Michigan	Attorney General Bill Schuette		miag@michigan.gov
Counsel for Detroit Branch NAACP, Michigan State Conference NAACP, Donnell White, individually and on behalf of Detroit Branch NAACP and Michigan State Conference NAACP, Thomas Stallworth III, individually, Rashida Tlaib, individually, and Maureen Taylor, individually, interested parties in this bankruptcy matter as it pertains to their civil suit in the Federal Eastern District Court of Michigan (Case Number 13-CV-12098)	Ayad Law PLLC	Nabih H Ayad	nayad@ayadlaw.com
Counsel for Erste Europäische Pfandbrief- und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A., Hypothekenbank Frankfurt AG, Hypothekenbank Frankfurt International S.A., and Erste Europäische Pfandbrief- und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A. (collectively "EEPK").	Ballard Spahr LLP	Matthew G Summers	summersm@ballardspahr.com
Counsel for Erste Europäische Pfandbrief- und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A., Hypothekenbank Frankfurt AG, Hypothekenbank Frankfurt International S.A., and Erste Europäische Pfandbrief- und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A. (collectively "EEPK").	Ballard Spahr LLP	Vincent J Marriott	marriott@ballardspahr.com
Attorneys for Hypothekenbank Frankfurt AG, Hypothekenbank Frankfurt International S.A., Erste Europäische Pfandbrief- und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A.	Ballard Spahr LLP	Vincent J. Marriott, III, Benjamin M. Schmidt, and Matthew A. White	marriott@ballardspahr.com; whitema@ballardspahr.com; schmidtb@ballardspahr.com
Counsel for Genuine Parts Company	Barack Ferrazzano Kirschbaum & Nagelberg LLP	Kimberly J Robinson	Kim.robinson@bfkn.com
Counsel for the 36th District Court for the State of Michigan	Barnes & Thornburg LLP	Patrick E. Mears	pmears@btlaw.com
Counsel for the 36th District Court for the State of Michigan	Barnes & Thornburg LLP	Peter A Clark	pclark@btlaw.com
Counsel to Hyde Park Cooperative and Plymouth Square Limited Housing Association	Becker & Wasvary PLLC	Carl G Becker	markwasvary@hotmail.com; mark@wasvarylaw.com
Counsel for Jerome Collins	Benjamin Whitfield, Jr. & Associates, P.C.	Benjamin Whitfield, Jr.	benlaw123@aol.com

**Exhibit A**  
Served via Email

Party Description	Company	Contact	Email
Counsel for Assured Guaranty Corporation and Assured Guaranty Municipal Corporation	Berkshire Hathaway Assurance Corporation	Attn: Kara Raiguel, Sunil Khanna and Thomas Scherer	skhanna@berkre.com
Counsel to UBS, AG (COP Swap Counterparties)	Bingham McCutchen LLP	Attn: Edwin E. Smith, Esq.	Edwin.smith@bingham.com
Counsel for UBS AG (COP Swap Counterparties)	Bingham McCutchen LLP	Edwin E Smith Jared Clark Steven Wilamowsky & E Marcus Marsh	edwin.smith@bingham.com;;marcus.mars@bingham.com
Counsel for U.S. Bank National Association (Top 20 Creditor)	Bodman PLC	Attn: Barbara A. Bowman, Esq.	bbowman@bodmanlaw.com
Counsel for Blue Cross Blue Shield of Michigan and Blue Care Network of Michigan	Bodman PLC	Brian R Trumbauer	btrumbauer@bodmanlaw.com
Counsel for Siemens Industry Inc.	Bowman and Brooke LLP		tom.branigan@bowmanandbrooke.com
Counsel for Amalgamated Transit Union Local 26	Bredhoff & Kaiser PLLC	Andrew D Roth Jeffrey R Freund & Douglas L Greenfield	aroth@bredhoff.com;jfreund@bredhoff.com;dgreenfield@bredhoff.com
Counsel for the Official Committee of Retirees	Brooks Wilkins Sharkey & Turco PLLC	Matthew E Wilkins & Paula A Hall	wilkins@bwst-law.com; hall@bwst-law.com
Attorneys for Creditors, Oracle America, Inc. and Oracle Credit Corporation	Buchalter Nemer, A Professional Corporation	Shawn M Christianson	schristianson@buchalter.com
Union Representative	Building & Construction Trades Council	Attn: John Wallace	express33@aol.com
Attorneys for Defendants Detroit General Retirement System Service Corporation and Detroit Police and Fire Retirement System Service Corporation	Butzel Long, PC	Brian E McGinty	McGinty@butzel.com
Attorneys for Defendants Detroit General Retirement System Service Corporation and Detroit Police and Fire Retirement System Service Corporation	Butzel Long, PC	Brian E McGinty	McGinty@butzel.com
Attorneys for Defendants Detroit General Retirement System Service Corporation and Detroit Police and Fire Retirement System Service Corporation	Butzel Long, PC	Bruce L Sendek	Sendek@butzel.com
Attorneys for Defendants Detroit General Retirement System Service Corporation and Detroit Police and Fire Retirement System Service Corporation	Butzel Long, PC	Bruce L Sendek	Sendek@butzel.com
Attorneys for Defendants, Detroit General Retirement System Service Corporation and Detroit Police and Fire Retirement System Service Corporation	Butzel Long, PC	Bruce L Sendek and Cynthia J Haffey	Haffey@butzel.com; Sendek@butzel.com
Attorneys for Defendants, Detroit General Retirement System Service Corporation and Detroit Police and Fire Retirement System Service Corporation	Butzel Long, PC	Bruce L Sendek and Cynthia J Haffey	Haffey@butzel.com; Sendek@butzel.com
Attorneys for Defendants Detroit General Retirement System Service Corporation and Detroit Police and Fire Retirement System Service Corporation	Butzel Long, PC	Cynthia J Haffey	Haffey@butzel.com
Interested Party	Caralyce M Lassner JD PC	Caralyce M Lassner	ecf@lassnerlaw.com
Counsel for Oakland County	Carson Fischer PLC	Attn Joseph M Fischer Robert Weisberg & Christopher Grossman	jfischer@carsonfischer.com;;rweisberg@carsonfischer.com;cgrossman@carsonfischer.com
Counsel for Assured Guaranty	Chadbourne & Parke LLP	Lisa Schapira Marc D. Ashley Marc B. Roitman	lschapira@chadbourne.com ; edaucher@chadbourne.com; mashley@chadbourne.com
Interested Party	Chase Paymentech LLC	Attn Lazonia Clark Business Analyst	lazonia.clark@chasepaymentech.com
Counsel for Treasurer, City of Detroit	City of Detroit, Law Department	Mary Beth Cobbs	cobbm@detroitmi.gov
Counsel for the Police and Fire Retirement System of the City of Detroit (the "PFRS") and the General Retirement System of the City of Detroit (the "GRS")	Clark Hill PLC	Shannon L Deaby	sdeaby@clarkhill.com
Counsel for International Union, UAW ("UAW")	Cohen Weiss and Simon LLP	Thomas N. Ciantra & Peter D. DeChiara and Joshua J. Ellison	pdechiara@cwsny.com; tciantra@cwsny.com; jelision@cwsny.com
Counsel for HP Enterprise Services LLC	Cole Schotz Meisel Forman & Leonard PA	Michael D Warner	mwarner@coleschotz.com
Counsel for Waste Management Inc.	Couzens Lansky Fealk Ellis Roeder & Lazar PC	Attn Jerry M Ellis	jerry.ellis@couzens.com
Counsel for Southeastern Oakland County Water Authority	Davis Burkett Savage Listman Brennan	William N Listman	rdavis@dbattorneys.com
Counsel for Merrill Lynch Capital Services, Inc.	Davis Polk & Wardwell LLP	Marshall S Huebner	detroit.chapter9.service@davispolk.com
Counsel for T-Mobile USA, Inc	Dawda, Mann, Mulcahy & Sadler, PLC	Attn Jessica B Allmand	jallmand@dmms.com
Counsel to National Industrial Maintenance – Michigan, Inc	Dean & Fulkerson	Attn Kevin N Summers	Ksummers@dflaw.com
Counsel for Berkshire Hathaway Assurance Corporation	Debevoise & Plimpton LLP	My Chi To & M Natasha Labovitz	mcto@debevoise.com;nlabovitz@debevoise.com
Attorneys for County of Macomb, Michigan, a Michigan Constitutional corporation, by and through its County Agency, the Macomb County Public Works Commissioner	Dechert LLP	Allan S Brilliant & Stephen M Wolpert	allan.brilliant@dechert.com; stephen.wolpert@dechert.com
Counsel for Dentons US LLP and Salans FMC SNR Dentons Europe LLP; and Counsel to the Official Retiree Committee	Dentons US LLP	Carole Neville	carole.neville@Dentons.com
Union Representative	Detroit Fire Fighters Association Local 344	Attn: Daniel McNamara	dmcnamara344@aol.com
Union Representative	Detroit Income Tax Investigators Association	Attn: Marcella Campbell	marcicampbel@gmail.com

In re City of Detroit, Michigan  
Case No. 13-53846

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**Exhibit A**  
Served via Email

Party Description	Company	Contact	Email
Union Representative	Detroit Police Command Officers Association	Attn: Steven Dolunt	DoluntS320@detroitmi.gov
Union Representative	Detroit Police Lieut. & Sergeants Association	Attn: Mark Young	youngM604@detroitmi.gov;;Polo4491@aol.com
Union Representative	Detroit Police Officers Association	Attn: Mark Diaz	DiazM3329@gmail.com
Counsel for Chapter 7 Trustee, Charles Taunt	Dib and Fagan PC	Barry S Fagan	bfagan@dibandfagan.com
State of Michigan, Department of Attorney General	Dickinson Wright PLLC	Dawn R Copley	dcopley@dickinsonwright.com
Counsel for Defendant MGM Grand Detroit, LLC	Dickinson Wright PLLC	Jeffery V Stuckey	jstuckey@dickinsonwright.com
Counsel for Defendant MGM Grand Detroit, LLC	Dickinson Wright PLLC	Peter H Ellsworth	pellsworth@dickinsonwright.com
State of Michigan, Department of Attorney General	Dickinson Wright PLLC	Steven G Howell and Allison R Bach	showell@dickinsonwright.com;;abach@dickinsonwright.com
Union Representative	DOT Foremen's Association of America Local 337	Attn: Nicholas Duncan	NicDun@detroitmi.gov
Union Representative	DOT Foreperson's Association of America	Attn: Pamela King	Pamkin@detroitmi.gov
Top 20 Creditor	Downtown Development Authority	Athanasiros Papapanos Glen W Long Jr and Rebecca Navin	Artp1@degc.org; gwlong@degc.org;
Counsel for Wilmington Trust Company, National Association	Drinker Biddle & Reath LLP	Attn: Kristin K. Going, Esq.	Kristin.Going@drb.com
Counsel for the City of Detroit	Dykema Gossett PLLC	Robert J. Franzinger and Jong-Ju Chang	jchang@dykema.com;
Union Representative	EMS Officers Association	Attn: James Gatteno	jgatteno@comcast.net
Counsel for Detroit Fire Fighters Association IAFF Local 344; Detroit Police Officers Association; Detroit Police Lieutenants and Sergeants Association; and Detroit Police Command Officers Association	Erman Teicher Miller Zucker & Freedman PC	David M Eisenberg	deisenberg@ermanteicher.com
Counsel for Detroit Fire Fighters Association IAFF Local 344; Detroit Police Officers Association; Detroit Police Lieutenants and Sergeants Association; and Detroit Police Command Officers Association	Erman Teicher Miller Zucker & Freedman PC	Earle I Erman & Julie Beth Teicher	eerman@ermanteicher.com; iteicher@ermanteicher.com
Personal Representative of the Estate of Hal Sandusky, Deceased; Desmond Ricks, Akilah Cobb, and Desire'a Ricks	Fieger, Fieger, Kenney & Harrington, P.C.	Stephanie L Arndt & James J. Harrington, IV	t.weglarz@fiegerlaw.com; s.arndt@fiegerlaw.com;j.harrington@fiegerlaw.com
Counsel to City of Detroit, Michigan	Foley & Lardner LLP	John A Simon	jsimon@foley.com
Counsel for U.S. Bank National Association (Top 20 Creditor)	Foster Swift Collins & Smith PC	Attn: John M. Kamins, Esq.	jkamins@fosterswift.com
Counsel for US Bank National Association, as Custodian	Foster Swift Collins & Smith PC	Dirk H Beckwith	dbeckwith@fosterswift.com
Counsel for the Bank of New York Mellon	Fulbright & Jaworski LLP	David A Rosenzweig	david.rosenzweig@nortonrosefulbright.com
Counsel for the Bank of New York Mellon	Fulbright & Jaworski LLP	Melanie M Kotler	melanie.kotler@nortonrosefulbright.com
Counsel for Hathaway Berkshire Assurance Corporation; Berkshire Hathaway Assurance Corporation	Garan Lucow Miller PC	Courtney A. Krause Christopher P Jelinek & Robert D Goldstein	ckrause@garanlucow.com
Top 20 Creditor - City's Pension Trusts	General Retirement System of the City of Detroit	Attn: Michael J. VanOverbeke, Esq.	mvanoverbeke@vmlaw.com
Counsel for US Health & Life Insurance Company	Gold Lange & Majoros PC	Sandra L Oconnor	soconnor@glmpc.com
Counsel for the Detroit Public Library	Gold Lange & Majoros PC	Stuart A Gold & Hannah Mufson McCollum	sgold@glmpc.com;
Counsel for Deborah Ryan and Catherine Phillips, et al	Goodman & Hurwitz PC	William H Goodman	mail@goodmanhurwitz.com;;bgoodman@goodmanhurwitz.com
Counsel to Brooks, Danean	Green Law Group PLC	Anthony Green	greenelawgroup@gmail.com
Counsel for Defendants Greektown Casino and Detroit Entertainment LLC dba Motorcity Casino Hotel	Honigman Miller Schwartz and Cohn LLP	Andrea L Hanse	ahansen@honigman.com
Counsel for General Motors LLC; Detroit Institute of Arts; Defendants Greektown Casino and Detroit Entertainment LLC dba Motorcity Casino Hotel	Honigman Miller Schwartz and Cohn LLP	Joseph R Sgroi	jsgroi@honigman.com
Union Representative	I.U.O.E. Local 324	Attn: William Miller	william.miller@iuoe324.org
Counsel for International Union, UAW ("UAW")	International Union, UAW	Michael Nicholson	mnicholson@uaw.net
Counsel for Iron Mountain Information Management LLC	Iron Mountain Information Management, LLC	Joseph Corrigan	Bankruptcy2@ironmountain.com

**Exhibit A**  
Served via Email

Party Description	Company	Contact	Email
Counsel for the Retired Detroit Police Members Association; William Ochadleus, Shelton Hayes, Shirley Berger, Raymond Yee, Frederick McClure Jr., John Clark, Jim Benici, Janice Butler, Morris Wells, Melvin Williams Sr., Kimberly Ann Sanders, Sarah E. Giddens, Deborah Ward, Jackie Fulbright, Catherine Tuttle, Rita Serra, Martin Treadwell, Ed Gaines, Barbara Triplett-Decrease, John J. O'Neill, Roy McCalister, Polly McCalister, Gail Wilson-Turner, Loletha Porter-Coleman, Afford Coleman, Jessie Banks, Lester Coleman, Deborah Lark, Moses Lark, Sharon Cowling, Michael Cowling, Robert Jackson, Rashelle Pettway, Michael A. Adams, John Hawkins, Laura Isom, Duane McKissic, Herbert Moreland, Cynthia Diane Moreland, Henry Elis, Keith Jackson Sr., Deborah Robinson, James Alexander Jr., Debra J. Fair, Brenda Goss-Andrews, Ricardo C. Jenkins, Jacqueline Jackson, Tommie Carodine, Lawrence V. Porter, Robbin Rivers, James R. Younger, Roscoe Mayfield, Charles Barbieri, Craig Schwartz, Glenda Cole-Dixon, Walter Long Jr., George Graves, Terrance Anderson, David Anderson, Nancy Fowler, George Chester, Anthony Klukowski Jr., Todd Klukowski, Roger Klukowski, Lois Klukowski-Hogen, Patricia McCabe, Daniel P. Root, Jeannetta Washington, Mike Foley, Deborah McCreary ("Ochadleus Objectors")	Jamie S Fields		jeansartre@msn.com
Counsel for ODM LLC	Jeffer Mangels Butler & Mitchell LLP	David M Poitras	dpoitras@jmbm.com
Counsel for International Outdoor Inc	Jeffery R Sieving		jeff@jobillboard.com
Counsel for David Sole	Jerome D Goldberg PLLC	Jerome D Goldberg	apclawyer@sbcglobal.net
Pro Se	John P Quinn		quinjohn@umich.edu
Counsel to the City	Jones Day	Brad B Erens	bberens@jonesday.com
Counsel to the City	Jones Day	Heather Lennox, Esq., Robert W. Hamilton	hlennox@jonesday.com; tawilson@jonesday.com; rwhamilton@jonesday.com
Counsel to the City	Jones Day	Jeffrey B. Ellman, Esq.	jbellman@jonesday.com
Counsel to the City	Jones Day	Bruce Bennett, Esq.	bbennett@jonesday.com
Co-Counsel for Attorneys for Health Alliance Plan of Michigan	K&L Gates LLP	Michael J Gearin	mike.gearin@klgates.com
Counsel for Michigan Bell Telephone Company d/b/a AT&T Michigan	Katten Muchin Rosenman LLP	Joseph P Sieger	john.sieger@kattenlaw.com
Counsel for Michigan Bell Telephone Company dba AT&T Michigan	Katten Muchin Rosenman LLP	Paige E Barr	paige.barr@kattenlaw.com
Counsel for New England Fertilizer Company and Wade Trim Associates Inc	Kerr Russell and Weber PLC	Jason W Bank	jbank@kerr-russell.com
Counsel for the City of Detroit Water and Sewerage Department and its Board of Water Commissioners	Kilpatrick & Associates PC	Richard I Kilpatrick	ecf@kaalaw.com
Counsel for Syncora Capital Assurance Inc., Syncora Holdings Ltd Syncora Guarantee Inc and Syncora Capital Assurance Inc	Kirkland & Ellis LLP	James HM Sprayregen PC Ryan Blaine Bennett & Noah J. Ornstein	james.sprayregen@kirkland.com; ryan.bennett@kirkland.com;
Counsel for Nuveen Asset Management and BlackRock Financial Management, Inc.	Kramer Levin Naftalis & Frankel LLP	Att Amy Caton	acaton@kramerlevin.com
Counsel to Certain Significant Holders of the COPS	Kramer Levin Naftalis & Frankel LLP	Thomas Moers Mayer	tmayer@kramerlevin.com
Detroit Police Lieutenants and Sergeants Association; and Detroit Police Officers Association; Detroit Fire Fighters Association, I.A.F.F. Local 344; Sanitary Chemists and Technicians Association; Association of Detroit Engineers; John Runyan	Law Office of Barbara A. Patek, PLC	Barbara A Patek	pateklaw@gmail.com
Counsel for Kim Spicer	Law Offices of Elizabeth A Ferguson PLLC	Elizabeth A Ferguson	lizferguson@lawofficeseaferguson.com
Counsel for JE Associates	LeClair Ryan	Evan A Burkholder	evan.burkholder@leclairryan.com
Counsel for the Detroit Fire Fighters Association IAFF Local 344	Leggio & Israel PC	Christopher P. Leggio & Alidz Oshagan	CPL@leggioisrael.com;
Interested Party	Linebarger Goggan Blair & Sampson LLP	John P Dillman	john.dillman@lbs.com
Counsel for the Retired Detroit Police and Fire Fighters Association; Donald Taylor; Shirley V Lightsey; and Detroit Retired City Employees Association	Lippitt O Keefe PLLC	Att Ryan C Plecha	rplecha@lippittokeefe.com
Counsel for the Retired Detroit Police and Fire Fighters Association; Donald Taylor; Detroit Retired City Employees Association; and Shirley V Lightsey	Lippitt O Keefe PLLC	Attn Brian O Keefe	bokeefe@lippittokeefe.com
Counsel for Syncora Guarantee Inc	Mantese Honigman Rossman and Williamson PC	Ian M Williamson	iwilliamson@manteselaw.com
Counsel for Amalgamated Transit Union Local 26	Mark H Cousens		cousens@cousenslaw.com
Counsel for the Detroit Police Lieutenants and Sergeants Association	Matheson Parr Osmer & Stevens PLC	John A Stevens	jstevens@mathesonparr.com

**Exhibit A**  
Served via Email

Party Description	Company	Contact	Email
Interested Party	McAlpine PC	Mark L McAlpine	mlmcalpine@mcalpinepc.com
Counsel for Syncora Holdings Ltd Syncora Guarantee Inc and Syncora Capital Assurance Inc	McDonald Hopkins PLC	Joshua A Gadharf	jgadharf@mcdonaldhopkins.com
Counsel for CSX Transportation Inc	McGuireWoods LLP	John H Maddock	jmaddock@mcguirewoods.com
Counsel for Michigan Council 25 of the American Federation of State, County and Municipal Employees (AFSCME), AFL-CIO	McKnight McClow Canzano Smith & Radtke PC	John R Canzano	jcanzano@michworklaw.com
Counsel to Michael J. Karwoski	Michael J. Karwoski, Esq.		mjkarwoski@alumni.nd.edu
Counsel to City of Detroit Michigan	Miller Canfield Paddock & Stone PLC	Stephen S LaPlante	laplante@millercanfield.com
Counsel for Meijer, Inc	Miller Canfield Paddock & Stone, PLC	Timothy A Fusco	fusco@millercanfield.com
Counsel for Michigan American Federation of State, County and Municipal Employees Local 3308 and Local 917	Miller Cohen PLC	Robert D Fetter & Richard G Mack Jr	rfetter@millercohen.com; richardmack@millercohen.com
Counsel to the City	Miller, Canfield, Paddock and Stone, P.L.C.	Jonathan S. Green, Esq. Stephen S. LaPlante Marc N. Swanson & Eric D Carlson	green@millercanfield.com; swansonm@millercanfield.com; laplante@millercanfield.com; carlson@millercanfield.com
Counsel for Fidelity Management & Research Company and Eaton Vance Management	Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.	William W Kannel & Adrienne K Walker	wwkannel@mintz.com; awalker@mintz.com
Counsel for Patricia Ramirez; Denise Gardner; Sheila Johnson; Kimberly James	Morgan & Meyers PLC	Brian T Keck	bkeck@morganmeiers.com
Proposed Counsel for Committee of Unsecured Creditors [motion denied]	Morrison & Foerster, LLP	Brett H. Miller and Lorenzo Marinuzzi	brettmiller@mofo.com; lmarinuzzi@mofo.com
Office of the United States Trustee	Office of the United States Trustee	Maria D Giannirakis	Maria.D.Giannirakis@usdoj.gov
Office of the United States Trustee	Office of the United States Trustee	Sean Cowley	Sean.Cowley@usdoj.gov
Counsel for Federal National Mortgage Association, creditor c/o Seterus, Inc., in the entitled action; and Everhome Mortgage Company as servicing agent for Everbank	Orlans Associates, P.C	Caleb J. Shureb, Heather D. McGivern, and Heather M. Dickow	hmcgivern@orlans.com;
Counsel for Michigan Property Tax Relief LLC; Gary Segatti and P.P.T.A., Inc., or Harold Hoyt; Jackie's Transport, Inc.	Osipov Bigelman PC	Yuly Osipov	yo@osbig.com
Counsel for UBS AG (COP Swap Counterparties)	Paul Weiss Rifkind Wharton & Garrison LLP	Daniel J Kramer & Kelley a Cornish	kcornish@paulweiss.com; dkramer@paulweiss.com
Counsel for Fountain Park Court Consumer Housing Cooperative St. James Cooperative, Individually and on Behalf of all Similarly Entities	Pentiuk Couvreur & Kobiljak PC	Randall A Pentiuk & Michael A Karman	rpentiuk@pck-law.com
Counsel for Debtor City of Detroit Michigan	Pepper Hamilton LLP	Deborah Kovsky-Apap	kovskyd@pepperlaw.com
Counsel for Debtor City of Detroit Michigan	Pepper Hamilton LLP	Kay Standridge Kress	kressk@pepperlaw.com
Counsel for Debtor City of Detroit Michigan; Michigan, Kevyn D. Orr, John Naglick, Michael Jamison, and Cheryl Johnson	Pepper Hamilton LLP	Robert S Hertzberg	hertzbergr@pepperlaw.com
Counsel for Waste Management, Inc.	Plunkett Cooney	David A. Lerner & Patrick C Lannen	dlerner@plunkettcooney.com; plannen@plunkettcooney.com
Counsel for Community Foundation for Southeast Michigan; William Davidson Foundation; The Fred A. and Barbara M. Erb Family Foundation; Max M. and Marjorie S. Fisher Foundation; The Ford Foundation; Hudson-Webber Foundation; W.K. Kellogg Foundation; McGregor Fund; Charles Stewart Mott Foundation; and A. Paul and Carol C. Schaap Foundation (Collectively, the "Foundations")	Plunkett Cooney	Douglas C Bernstein	dbernstein@plunkettcooney.com
Top 20 Creditor - City's Pension Trusts	Police and Fire Retirement System of the City of Detroit	Attn: Joseph E. Turner, Esq.	jturner@clarkhill.com
Union Representative	Police Officers Association of Michigan	Attn: John Barr	poam@poam.net
Union Representative	Police Officers Labor Council	Attn: Chet Kulesza	ck445polc@yahoo.com
Union Representative	Police Officers Labor Council	Attn: Jan Zaleski	presidentjan@aol.com
Union Representative	Police Officers Labor Council	Attn: Marvin Hansberry	HansberryM@detroitmi.gov
Counsel for CitiMortgage, Inc.	Potestivo & Associates PC	Mary Atallah	matallah@potestivolaw.com
Interested Party	Primeshares World Markets, LLC		jd@primeshares.com; transfer@primeshares.com
Counsel for Michael Beydoun	Raymond Guzall III PC	Raymond Guzall III	rayguzall@attorneyguzall.com
Attorneys for Creditors: Carlton Carter, Bobby Jones, Roderick Holley and Richard T. Weatherly	Resnick & Moss PC	H Nathan Resnick	hnresnick@resnicklaw.net; hnresnick@resnicklaw.com
Retiree Representative	Retired Detroit Police and Fire Fighters Association	Attn: Donald Taylor	rdpffa@hotmail.com

**Exhibit A**  
Served via Email

Party Description	Company	Contact	Email
Counsel to Eric Kimbrough, Leinathian Jelks, Brandon Brooks, Phyllis Tharpe, Rodney Heard, Clenette Harris, Gregory Brazell, Jennifer Harris-Barnes, Henry Hassan, Melvin Miller, Terry Hardison, Velma, Denson, Raymond Thompson, Lucy Flowers, Brandon Gilbert, Brady Johnson, Quentin King, Sharon Pettway, Taralyn Smith, Donna Weatherspoon, Tarita Wilburn, Joseph Wright, Laverne Covington, James Matson, Kevin McGillivray, Rhonda Craig, Orlando Marion, John Collins, Terry Hardison, Carolyn Harp, Jeffrey Peterson, Clementine Stephens, Ezekiel Davis, Michael McKay, David Both, Raymond Thompson, Jr., Doug Taylor, Shumithia Baker, Floyd Brunson, Jerry Ashley, Anthony Harmon, Shelton Bell, Jr., Jeremiah Duren, Otis Evans, Wendy Jefferson, Gary Musser, Mario Littlejohn, Angela Davis, Jeffrey Theriot, Bernard White, Eddie Moore, Robert McGowen, Curtis Morris, Honora Porter, Kevin McDonald, Jay Woods, Taesean Parnell, Yvette Spencer, Viena Lowe, Landon Banks, Darchella Lattner, Nicholas Martin, Marily Cloyd, Robert Hall, Victoria Wilson, Theresa Chalch, Angela Davis, Jamie Jackson, Donald Harris, Winter Owens, Samiya Speed, Teran Brown, Antonio Brooks, Jermaine Gleon, Ray Lizzamore, Daniel Latanzio, Woodrow Roberson, Kevin Ivie, Darnell Fields, Daniel Soto, Kevin McGillivray, and Bradley Schick.	Romano Law PLLC	Attn Daniel G Romano & Trevor J. Zamborsky	dromano@romanolawpllc.com
Counsel for Robbie Flowers, Michael Wells, Janet Whiston, Mary Washington and Bruce Goldman ("Flowers plaintiffs"); and Detroit Police Command Officers Association ("DPCOA"); Detroit Fire Fighters Association, I.A.F.F. Local 344	Sachs Waldman PC	Mami Kato & Mary Ellen Gurewitz	mkato@sachswaldman.com; claude.montgomery@dentons.com
Counsel for Official Retiree Committee	Salans FMC SNR Dentons Europe LLP	Claude Montgomery	claude.montgomery@dentons.com
Contract Counterparty	SBS Financial Products Company, LLC	Attn. John Carter	jcarter@sbsco.com
Counsel for Ambac Assurance Corporation	Schafer and Weiner PLLC	Brendan G Best	bbest@schaferandweiner.com
Counsel for FMS Wertmanagement AöR	Schiff Hardin LLP	Frederick J. Sperling & Paul E. Greenwalt	fsperling@schiffhardin.com; pgreenwalt@schiffhardin.com
Counsel for DEPFA Bank PLC	Schiff Hardin LLP	Rick L Frimmer & Matthew W Ott	mott@schiffhardin.com
Counsel for DEPFA Bank PLC	Schiff Hardin LLP	Suzanne L Wahl	swahl@schiffhardin.com
Counsel for Schneiderman and Sherman PC; Attorney for U.S. Bank National Association as servicer for Michigan State Housing Development Authority; Flagstar Bank, FSB; Counsel for Kondaur Capital Corporation	Schneiderman & Sherman PC	Neil Sherman	NSherman@sspclegal.com
Union Representative	SEIU Local 517M	Attn: Yolanda Langston	langstony@gmail.com
Union Representative	Senior Accountants, Analysts & Appraisers Association	Attn: Audrey Bellamy	ayoung586@comcast.net
Union Representative	Senior Water Systems Chemist Association	Attn: Andrew Ross	aross@dwsd.org
Counsel for The Kales Grand Circus Park LLC	Seyburn Kahn	David T Lin	dlin@seyburn.com
Fee Examiner	Shaw Fishman Glantz & Towbin LLC	Ira Bodenstein Gordon Gouveia David Doyle and Marc Reiser	ibodenstein@shawfishman.com; ggouveia@shawfishman.com; ddoyle@shawfishman.com
Counsel for Detroit Winsor Tunnell LLC	Sheldon S Toll PLLC	Sheldon S Toll	lawtoll@comcast.net
Counsel for National Public Finance Guarantee Corporation	Sidley Austin LLP	Attn Guy S Neal	gneal@sidley.com
Counsel for National Public Finance Guarantee Corporation	Sidley Austin LLP	Attn James F Bendernagel	jbendernagel@sidley.com
Counsel for National Public Finance Guarantee Corporation	Sidley Austin LLP	Attn Jeffrey E Bjork	bjbjork@sidley.com
Counsel for National Public Finance Guarantee Corporation	Sidley Austin LLP	Attn: Jeffrey Bjork, Esq. & Eric D. Tashman, Esq.	etashman@sidley.com; jbjork@sidley.com
Counsel for Retired Detroit Police and Fire Fighters Association ("RDPFFA"); 2) Donald Taylor, President of RDPFFA; 3) Detroit Retired City Employees Association ("DRCEA"); and 4) Shirley V. Lightsey, President of DRCEA	Silverman & Morris PLLC	Thomas R Morris and Karin F. Avery	morris@silvermanmorris.com; avery@silvermanmorris.com
Counsel for Unisys Corporation	Sirlin Lesser & Benson PC	Dana S Plon	dplon@sirlinlaw.com
Counsel for Airgas USA LLC	Smith Katzenstein & Jenkins LLP	Kathleen M Miller	kmiller@skjlaw.com
State of Michigan Chief Legal Counsel	State of Michigan Chief Legal Counsel	Matthew Schneider	Schneider7@michigan.gov
State of Michigan Assistant Attorney General, Counsel to State of Michigan	State of Michigan Revenue & Collections Division	Steven B Flancher & Matthew Schneider	flanchers@michigan.gov; schneider7@michigan.gov
The Office of the Treasurer for the State of Michigan	State Treasurer		MIStateTreasurer@michigan.gov
Counsel for Nuveen Asset Management and BlackRock Financial Management, Inc.; and Greenhill & Co LLC	Steinberg Shapiro & Clark	Mark H Shapiro	shapiro@steinbergshapiro.com

In re City of Detroit, Michigan

Case No. 13-53846-tjt

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**Exhibit A**  
Served via Email

Party Description	Company	Contact	Email
Counsel for Gabriel, Roeder, Smith & Company; Clark Associates, Inc.	Stevenson & Bullock PLC	Charles D Bullock Elliot G Crowder & Sean M Walsh	cbullock@sbplclaw.com; ecrowder@sbplclaw.com
Counsel for the Detroit Police Lieutenants and Sergeants Association	Sudnick Law PC	Peter P Sudnick	psudnick@sudnicklaw.com
Counsel for Syncora Guarantee Inc	Susheel Kirpalani Quinn Emanuel Urquhart & Sullivan, LLP		susheelkirpalani@quinnemanuel.com
Sylvia Jean Brown Jones, Pro Se	Sylvia Jean Brown Jones		bjdelta55@gmail.com
Union Representative	Teamsters Local #214	Attn: Joseph Valenti	tl214teams@teamsters214.org
City's Secured & Unsecured Bonds	The Bank of New York Mellon Trust Company, National Association, as trustee	Attn: Eduardo Rodriguez	eduardo.rodriguez@bnymellon.com
Corporation Counsel for the City of Detroit	The City of Detroit	Attn: Corporation Counsel	Johnsoncu@detroitmi.gov
Counsel for Derrez Payne	The Law Offices of Joumana Kayrouz, PLLC	1000 Town Center, Ste 800	mbenkstein@joumanakayrouz.com
Counsel for Kevin Lewis & Jeremy Morris	The Markowitz Law Office	Carolyn B Markowitz PC	bankruptcy@markowitzlegal.com
Counsel for Michigan Auto Recovery Service Inc; Wayne County Circuit Court, Hyde Park Cooperative, et al. v. City of Detroit, by and through its Buildings and Safety Engineering Department, Case No. 10-005687-CZ	Thornbladh Legal Group PLLC	Kurt Thornbladh	kthornbladh@gmail.com; thornbladh.kurt3@gmail.com
Counsel for City of Detroit, Michigan	Togut Segal & Segal LLP	Attention: Albert Togut, Scott E. Ratner & Neil Berger	seratner@teamtogut.com; neilberger@teamtogut.com; dperson@teamtogut.com; adeering@teamtogut.com; dcahir@teamtogut.com
Top 20 Creditor - City's Secured & Unsecured Bonds (Including Sewer and Water)	U.S. Bank National Association, as trustee, bond registrar transfer agent, paying agent, custodian and/or contract administrator	Attn: Susan E. Jacobsen VP	susan.jacobsen2@usbank.com
Union Representative	UAW - Local # 412	Attn: John Cunningham	jcunningham@uaw.net
Union Representative	UAW - Local #212	Attn: John Cunningham	jcunningham@uaw.net
Union Representative	UAW - PAA Local #2211	Attn: Robyn Brooks	BrooR@detroitmi.gov
Union Representative	UAW - WWTP Local #2200	Attn: Laurie Stuart	mimilaurie@yahoo.com;
Union Representative	United Auto Workers Union	Attn: Michael Nicholson	mnicholson@nichfeld.com
Union Representative	Utility Workers Union of America	Attn: James Harrison	jharrison@uwua.net
Union Representative	Utility Workers Union of America Local #531	Attn: Samuel Wilson	swilson@dwsd.org
Counsel for Center for Community Justice and Advocacy ("CCJA")	Vanessa G. Fluker, Esq., PLLC	Vanessa G Fluker	vgflawyer@sbcglobal.net
Interested Party	Vanguardians	Barry Allen	pra@vanguardians.org
Counsel for UBS AG and Merrill Lynch Capital Services Inc (COP Swap Counterparties)	Warner Norcross & Judd LLP	Douglas A Dozeman & Charles N Ash Jr	ddozeman@wnj.com;;cash@wnj.com
Counsel for Financial Guaranty Insurance Company	Weil, Gotshal & Manges LLP	Alfredo R Perez	alfredo.perez@weil.com
Counsel for Financial Guaranty Insurance Company	Weil, Gotshal & Manges LLP	Attn: Gary T. Holtzer, Esq. & Alfredo R. Pérez, Esq.	gary.holtzer@weil.com;;alfredo.perez@weil.com
Counsel for Financial Guaranty Insurance Company	Weil, Gotshal & Manges LLP	Kelly DiBlasi	kelly.diblasi@weil.com
Counsel for Financial Guaranty Insurance Company	Williams Williams Rattner & Plunkett PC	Ernest J Essad Jr	ejessad@wrrplaw.com
Counsel for Assured Guaranty Municipal Corporation	Winston & Strawn LLP	Attn: Lawrence A. Larose Samuel S. Kohn Carrie V. Hardman	chardman@winston.com
Counsel for The Bank of New York Mellon	Wolfson Bolton PLLC	Scott A Wolfson & Anthony J Kochis	swolfson@wolfsonbolton.com; akochis@wolfsonbolton.com
Counsel for International Association of Fire Fighters, AFL-CIO, CL	Woodley & McGillivray	Douglas L Steele	dls@wmlaborlaw.com

## **EXHIBIT B**

**Exhibit B**  
Served via First Class Mail

Party Description	Company	Contact	Address 1	Address 2	City	State	Zip	Country
Union Representative	AFSCME Council #25	Attn: Albert Garrett	1034 N. Washington		Lansing	MI	48906	
Union Representative	AFSCME Council #25	Attn: Albert Garrett	600 W. Lafayette, Ste. 500		Lansing	MI	48906	
Union Representative	AFSCME Council #25	Attn: Ed McNeil	600 W. Lafayette, Ste. 500		Detroit	MI	48226	
Union Representative	AFSCME Local #0023	Attn: Robert Stokes	600 W. Lafayette, Ste. 134		Detroit	MI	48226	
Union Representative	AFSCME Local #0312	Attn: Phillip Douglas	14022 Linwood		Detroit	MI	48238	
Union Representative	AFSCME Local #0457	Attn: Laurie Walker	600 W. Lafayette, Ste. L – 104		Detroit	MI	48226	
Union Representative	AFSCME Local #1220	Attn: Gerald Thompson	600 W. Lafayette, Ste. 136		Detroit	MI	48226	
Union Representative	AFSCME Local #1227	Attn: Joseph Walter	P.O. Box 36314		Grosse Pointe Farms	MI	48236	
Union Representative	AFSCME Local #1642	Attn: Gina Thompson-Mitchell	600 W. Lafayette, Ste. L – 123		Detroit	MI	48226	
Counsel for Airgas USA LLC	Airgas USA LLC	Mr David Boyle	259 Radnor-Chester Rd Ste 100	PO Box 6675	Radnor	PA	19087-8675	
Union Representative	Association of Professional Construction Inspectors	Attn: Juanita Sanders	2727 Second Ave., Ste. 314B		Detroit	MI	48201	
Counsel for Kajy Development	David W Yaldo PC	David W. Yaldo	4036 Telegraph Road, Suite 204		Bloomfield Hills	MI	48302	
Retiree Representative	Detroit Firemen's Fund Association	Attn: Kim Fett	1301 Third St. Suite 329		Detroit	MI	48226	
Retiree Representative	Detroit Police Benefit and Protective Association	Attn: Delbert R. Jennings, Sr.	3031 W. Grand Boulevard, Suite 405		Detroit	MI	48202	
Retiree Representative	Detroit Retired City Employees Association	Attn: Shirley V. Lightsey	P.O. Box 40713		Detroit	MI	48240	
Counsel for U.S. Bank National Association (Top 20 Creditor)	Faegre Baker Daniels LLP	Attn: Abby E. Wilkinson, Esq.	2200 Wells Fargo Center	90 South Seventh Street	Minneapolis	MN	55402-3901	
Union Representative	Field Engineers Association	Attn Larry Hart	PO Box 252805		West Bloomfield	MI	48325	
The Office of the Governor of the State of Michigan	Governor Rick Snyder		P.O. Box 30013		Lansing	MI	48909	
Counsel for Defendants Greektown Casino and Detroit Entertainment LLC dba Motorcity Casino Hotel	Honigman Miller Schwartz and Cohn LLP	Jennifer Zbytowski Belveal	2290 First National Bldg	660 Woodward Ave	Detroit	MI	48226-3506	
Counsel for The Detroit Institute of Arts	Honigman Miller Schwartz and Cohn LLP	T. O'Reilly	600 Woodward Ave	2290 First National Bldg	Detroit	MI	48226	
Counsel for HP Enterprise Services LLC	HP Enterprises Services LLC	Ayala Hassell	5400 Legacy Dr		Plano	TX	75024	
Counsel for HP Enterprise Services LLC	HP Enterprises Services LLC	Ken Higman	12610 Park Plz Dr Ste 100		Cerritos	CA	90703	
Interested Party	IBM Corporation	Attn National Bankruptcy Coordinator	275 Viger East Ste 400		Montreal	QC	H2X 3R7	Canada
Counsel for IBM Credit LLC	IBM Credit LLC	Andy Gravina	Special Handling Group MD NC317	6303 Barfield Rd NE	Atlanta	GA	30328	
Counsel for St Martins Cooperative	Law Offices of Lee & Correll	Michael K Lee	24901 Northwestern Hwy Ste 113		Southfield	MI	48075	
Counsel for FK Park, LLC and FK South, LLC	Maddin, Hauser, Roth & Heller, P.C.	Ian S Bolton	28400 Northwestern Hwy 2nd Fl		Southfield	MI	48034	
Counsel for Syncora Guarantee Inc	Mantese Honigman Rossman and Williamson PC	Brendan Frey	1361 E. Big Beaver Road		Troy	MI	48083	

**Exhibit B**  
Served via First Class Mail

Party Description	Company	Contact	Address 1	Address 2	City	State	Zip	Country
Counsel for Bishop Real Estate, L.L.C.	McDonald Hopkins PLC	Jason L Weiner	39533 Woodward Ave Ste 318		Bloomfield Hills	MI	48304	
Pro se	Nathaniel Brent		538 S Livernois		Detroit	MI	48209	
Office of the United States Trustee	Office of the United States Trustee	Daniel McDermott	211 West Fort Street Suite 700		Detroit	MI	48226	
Counsel enters an appearance for The Bank of New York Mellon (successor by operation of law to The Bank of New York), as custodian of the Police and Fire Retirement System of the City of Detroit Fund and as custodian of the General Retirement System of the City of Detroit Fund	Reed Smith LLP	Amy M Toni	225 Fifth Ave		Pittsburgh	PA	15222	
Interested Party	Ricoh USA Inc	Recovery & Bankruptcy Group	3920 Arkwright Rd Ste 400		Macon	GA	31210	
Union Representative	Sanitary, Chemists & Technicians Association	Attn: Saulius Simoliunas	2727 Second Ave. Rm. 314 – D		Detroit	MI	48201	
Counsel for Parsons Brinckerhoff Michigan, Inc.	Schiff Hardin LLP	Andrew M. Minear	666 Fifth Ave	17th Fl	New York	NY	10103	
SEC	Securities & Exchange Commission	Bankruptcy Section	175 W Jackson Blvd	Suite 900	Chicago	IL	60604-2815	
Counsel for 415 East Congress, LLC; Attorney for Creditor K & P, Incorporated; H.D.V. Greektown, LLC	Shafer & Associates PC	Matthew J Hoffer	3800 Capital City Blvd Ste 2		Lansing	MI	48906	
Counsel for National Public Finance Guarantee Corporation	Sidley Austin LLP	Attn: Guy S. Neal, Esq.	1501 K Street, N.W.		Washington	DC	20005	
Counsel for Public Lighting Authority	The Allen Law Group, P.C.	Attn: Ron Liscombe, Esq.	3011 West Grand Boulevard	2500 Fisher Building	Detroit	MI	48202	
The City, c/o the Emergency Manager	The City of Detroit	Attn: Kevyn D. Orr, Emergency Manager	Coleman A. Young Municipal Center	2 Woodward Ave Suite 1126	Detroit	MI	48226	
Counsel for Michigan Council 25 of the American Federation of State, County and Municipal Employees (AFSCME), AFL-CIO	The Sanders Law Firm PC	Herbert A Sander	615 Griswold St Ste 913		Detroit	MI	48226	
Top 20 Creditor - City's Secured & Unsecured Bonds (Including Sewer and Water)	U.S. Bank National Association, as trustee, bond registrar transfer agent, paying agent, custodian and/or contract administrator	Attn: Susan T. Brown	Senior Vice President and Manager	535 Griswold Ste 550	Detroit	MI	48226	
Top 20 Creditor - City's Secured & Unsecured Bonds (Including Sewer and Water Bonds)	U.S. Bank National Association, as trustee, for the Detroit Sewer and Water Bonds	Attn: Lawrence J. Bell	PD-OR-P6TD		Portland	OR	97204	
Counsel for United States of America	United States Attorney	Julia A. Caroff, Assistant US Attorney	211 W Fort St Ste 2001		Detroit	MI	48226	
Union Representative	Utility Workers Union of America Local #488	Attn: Carl Anderson	19315 Westmoreland		Detroit	MI	48219	
Union Representative	Utility Workers Union of America Local #504	Attn: Curlisa Jones	5405 Railview Ct. - Apt. 166		Shelby Township	MI	48316	
Counsel for U.S. Bank National Association (Top 20 Creditor)	Waller Lansden Dortch & Davis LLP	Attn: Courtney Rogers	511 Union Street, Suite 2700		Nashville	TN	37219	
Counsel for Assured Guaranty Municipal Corporation	Winston & Strawn LLP	Sarah T. Foss	1111 Louisiana 25th Fl		Houston	TX	77002-5242	

# **EXHIBIT C**

**Exhibit C**  
**Served via First Class Mail**

CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
Guntzviller, Sandra	Levine Benjamin, P.C.	Greg M. Liepshutz P37573	100 Galleria Officentre Ste 411	Southfield	MI	48034
Guntzviller, Sandra		27700 Northwestern Hwy	Suite 411	Southfield	MI	48034
Nathaniel Henry Brent		6110 Carleton Rockwood Rd		South Rockwood	MI	48179

In re City of Detroit, Michigan  
Case No. 13-53846

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## **Exhibit B**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:  City of Detroit, Michigan,  Debtor.	Bankruptcy Case No. 13-53846  Judge Thomas J. Tucker  Chapter 9
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**ORDER SUSTAINING DEBTOR'S SIXTY-SIXTH OMNIBUS OBJECTION  
TO CERTAIN CLAIMS**

**(No Valid Basis for any Liability of the City)**

Upon review of the Sixty-Sixth objection to claims (the “Objection”),<sup>1</sup> of the Debtor, City of Detroit, Michigan (the “City”), seeking entry of an order disallowing and expunging each of the claims listed on Exhibit 2 to the Objection; and it appearing that this Court has jurisdiction over the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and Article VII of the Plan; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that venue of this proceeding and the Objection in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that the relief requested in the Objection is in the best interests of the City, and its creditors; and due and proper notice of the Objection having been given as provided in the Objection; and it appearing that no other or further notice of the Objection need be

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Objection.

given; and a hearing on the Objection having been held before the Court; and any objections or other responses to the Objection having been overruled or withdrawn; and the Court finding that the legal and factual bases set forth in the Objection and at the hearing establish just cause for the relief granted; and after due deliberation and good and sufficient cause appearing therefore;

IT IS ORDERED that:

1. The Objection is sustained.
2. Each of the proofs of claim listed on Exhibit 2 annexed to the Objection is hereby disallowed and expunged in its entirety, pursuant to Section 502(b) of the Bankruptcy Code.
3. The City's claims agent is authorized to update the claims register to reflect the relief granted in this Order.
4. The City is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Objection.
5. Each claim and the objections by the City to each claim as addressed in the Objection and set forth on Exhibit 2 constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed and constitute a separate order with respect to each such claim and, to the extent necessary under Bankruptcy Rules 7054 and 9014, constitutes a final judgment with respect to such claim, and the Court expressly determines that there is no just

reason for delay of the entry of the final judgment with respect to such claim. Any stay of this Order shall apply only to the contested matter that involves such creditor and for which such stay has been granted or may be in effect, and shall not act to stay the applicability or finality of this Order with respect to the other contested matters covered hereby, and further provided that the City shall have the right, but not the need, to submit a separate order with respect to contested matters or claims.

6. The City retains all of its rights to object, on the merits or any other basis, to any of the Claims identified on Exhibit 2.

7. Notice of the Objection as provided therein is good and sufficient notice of such objection, and the requirements of Bankruptcy Rule 3007(a) and the local rules of the Court are satisfied by such notice.

8. Nothing in this Order is intended to, shall constitute or shall be deemed to constitute the City's consent, pursuant to section 904 of the Bankruptcy Code, to this Court's interference with (a) any of the political or governmental powers of the City, (b) any of the property or revenues of the City or (c) the City's use or enjoyment of any income-producing property.